

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

CASE NO.: 1:25-cv-22324-WPD

HARVEY JAMES GOMEZ FROMETA, an individual; FREDDY AMADO GOMEZ FROMETA, an individual; BELKIS PIERINA GOMEZ FROMETA, an individual; PIERINA ZULETA FROMETA, an individual; CAROLINA ZULETA FROMETA, an individual; LUIS ALEJANDRO ZULETA FROMETA, an individual; DINORAH MERCEDES FROMETA SENIOR, an individual; HAYDEE FROMETA BELLO, an individual; LUIS VICENTE FROMETA BELLO, an individual; LUIS MANUEL FROMETA PAREJA, an individual; BARBARA REGINA FROMETA GRILLO a.k.a. BARBARA REGINA FROMETA DE SIGISMONDI, an individual; TRINA MARGARITA FROMETA GRILLO, an individual; JOSE ANTONIO FROMETA GRILLO, an individual; ILEANA ALEJANDRINA FROMETA GRILLO, an individual; MAGDALENA FROMETA GRILLO, an individual,
Plaintiffs,

v.

ADRIAN FROMETA SUBERO, an individual; BILLO'S CARACAS BOYS LLC, a Florida limited liability company; TELMO PEREZ QUIROZ, an individual,

Defendants.

I, Joel B. Rothman, declare and say:

1. I am an attorney for Plaintiffs HARVEY JAMES GOMEZ FROMETA, an

individual; FREDDY AMADO GOMEZ FROMETA, BELKIS PIERINA GOMEZ FROMETA, PIERINA ZULETA FROMETA, CAROLINA ZULETA FROMETA, LUIS ALEJANDRO ZULETA FROMETA, DINORAH MERCEDES FROMETA SENIOR, HAYDEE FROMETA BELLO, LUIS VICENTE FROMETA BELLO, LUIS MANUEL FROMETA PAREJA, BARBARA REGINA FROMETA GRILLO a.k.a. BARBARA REGINA FROMETA DE SIGISMONDI, TRINA MARGARITA FROMETA GRILLO, JOSE ANTONIO FROMETA GRILLO, ILEANA ALEJANDRINA FROMETA GRILLO, and MAGDALENA FROMETA GRILLO, , (collectively, “Plaintiffs”) in the above captioned action.

2. I am personally knowledgeable of the matters set forth in this declaration and, if called upon to do so, I could and would competently testify to the following facts set forth below.

3. Attached hereto as Exhibit 10 is a true and correct copy of the online record of the Florida Department of State showing that Adrian Frometa Subero (“Subero”) is the registered agent for Billo’s Caracas Boys LLC (“BCB”).

4. Attached hereto as Exhibit 11 is a true and correct copy of BCB’s 2025 Florida Limited Liability Company Annual Report signed by Subero.

5. Attached hereto as Exhibit 12 is a true and correct copy of the ruling in the first Venezuelan suit Plaintiffs filed against Defendants Subero and Quiroz.

6. Attached hereto as Exhibit 13 is a true and correct copy of the injunction ordered in the second Venezuelan suit against Subero and Quiroz.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 17, 2025

/s/ Joel B. Rothman
JOEL B. ROTHMAN
Florida Bar No. 98220